Law Office of Robert Osuna, PC 11 Park Place, Suite 1100 New York, New York 10007 212-233-1033

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Application GRANTED. Defendant Yibin Tan is hereby permitted to travel to FCI

Danbury in Connecticut pick up his wife and co-defendant Jin Lian Chen on

January 2, 2025. Mr. Tan Shall return that same day.

Hon. Jennifer H. Rearden U.S. District Judge

The Clerk of Court is directed to terminate ECF No. 81.

Southern District of New York

SO ORDERED.

500 Pearl Street

New York, NY 10007

December 23, 2024

Jennifer H. Rearden, U.S.D.J.
Dated: December 23, 2024

Re: United States v. Tan et al, 23-cr-015

Request to Travel Outside the Jurisdiction with the Consent of the

Government

Dear Judge Rearden,

My office represented Mr. Tan in the above proceedings.

Mr. Tan's wife and co-defendant, Ms. Chen, is scheduled to be released from FCI Danbury in Connecticut on January 2nd, 2025.

My client would like to pick up Ms. Chen on the day of her release.

Ms. Chen is scheduled to be released at 8am. Mr. Tan would leave his home early that morning and return on the same day.

The Pretrial Services Officer consents to Mr. Tan's travel request, as does AUSA Nessim.

I thank Your Honor for your time and attention to this matter.

Sincerely,

/s/

Law Office of Robert Osuna, PC By: Robert Osuna, Esq.